

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**GOVERNMENT'S ASSENTED-TO MOTION TO SEAL ITS FORTHCOMING
OPPOSITION TO DEFENDANT'S MOTION FOR COMPASSIONATE RELEASE**

The United States of America respectfully requests the Court's leave to file its forthcoming Opposition to the Defendant's Motion for Compassionate Release under seal.

On December 26, 2024, the Defendant filed a Motion for Compassionate Release (Dkt. No. 114) and filed an Amended Motion the following day (Dkt. No. 115). Defendant's Motion discussed and described the Defendant's medical conditions and medical needs, and included as exhibits medical records and other documents describing Sullivan's medical history.

The Government opposes the Defendant's request for early release and will file its memorandum in opposition to the Defendant's Motion on January 10, 2025. The Government's opposition will discuss and describe Defendant's medical needs. Accordingly, in order to protect the Defendant's privacy rights, the Government requests leave to file its opposition under seal.

If the Government's request for leave to file under seal is granted, the Government will file its opposition under seal and will file a redacted version to the public docket.

The Government has conferred with counsel for the Defendant and the Defendant assents to the relief requested in this motion.

Respectfully submitted,

UNITED STATES OF AMERICA,

By its attorney,

JOSHUA S. LEVY
United States Attorney

Dated: January 8, 2025

/s/ Christopher Looney

Christopher Looney
Assistant United States Attorney

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Christopher Looney

Christopher Looney
Assistant United States Attorney

Dated: January 8, 2025